



**PINNACLE**  
LAW FIRM, PLLC

October 24, 2018

VIA HAND DELIVERY

Matthew D. Campbell  
matt@pinnaclelawfirm.com

104 Winnwood Rd.  
Little Rock, AR 72207

P: (501) 396-9246  
F: (501) 421-0189

www.pinnaclelawfirm.com

Arkansas Ethics Commission  
501 Woodland St. #301N  
Little Rock, AR 72201

RE: Governor Asa Hutchinson

To Whom It May Concern:

Asa Hutchinson is a candidate for Governor of Arkansas, which is a public office within the meaning of Arkansas Code Annotated § 7-6-201(16).<sup>1</sup> Under Arkansas Code Annotated § 7-6-203(b)(1), it is unlawful for a candidate for public office or for any person acting on the candidate's behalf to accept campaign contributions in excess of two thousand seven hundred (\$2,700) per election from an individual.

In his 2017 Third Quarter CC&E, Gov. Hutchinson reported two contributions of \$2,700 each for the primary and general election from Ms. Scarlett Basore of Bella Vista, AR, received on September 29, 2017. *See* Addendum A. In his 10-Day Pre-election CC&E, Gov. Hutchinson reported an additional \$2,700 primary election contribution from Ms. Basore on May 7, 2018. *See id.* Gov. Hutchinson's May 2018 CC&E (filed June 15, 2018) reflects an additional \$2,700 general election contribution from Ms. Basore, also on May 7. *See id.*

In addition to accepting \$2,700 over the individual contribution limit for both the primary and general elections, Gov. Hutchinson's 10-Day Pre-election CC&E and his May 2018 CC&E each reflect improper cumulative

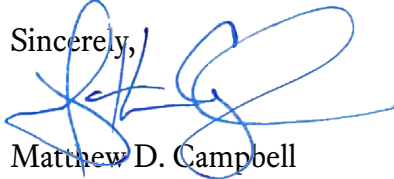
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<sup>1</sup> "Candidate" means any individual who has knowingly and willingly taken affirmative action, including solicitation of funds, for the purpose of seeking nomination for or election to any public office. Ark. Code Ann. § 7-6-201(1). "Public office" means any office created by or under authority of the laws of the State of Arkansas or of a subdivision thereof that is filled by the voters, except a federal office. Ark. Code Ann. § 7-6-201(16).

totals for contributions from Ms. Basore. Arkansas Code Annotated § 7-6-207(b)(1)(C) requires that a CC&E contain, *inter alia*, “the aggregate contributed for each election” from each contributor.

Accordingly, it appears that, by accepting the May 7, 2018 contributions from Ms. Basore, Gov. Hutchinson has committed two violations of Arkansas Code Annotated § 7-6-203(b)(1). By failing to properly report the cumulative total contributed by Ms. Basore for each election, Gov. Hutchinson also appears to have committed two violations of Arkansas Code Annotated § 7-6-207(b)(1)(C).

If you have any questions about this complaint, or if I can provide any additional information, please don't hesitate to ask.

Sincerely,  
  
Matthew D. Campbell

Encl.: Addendum A

## ADDENDUM A

Third Quarter 2017 CC&E, at page 49:

9/29/2017	Scarlett Basore 10 Nottingham Cir, Bella Vista, AR 72715	Self - Employed General Business	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> Pri. Run-Off <input type="checkbox"/> General <input type="checkbox"/> Gen. Run-Off <input type="checkbox"/> Special Election <input type="checkbox"/> Debt <span style="float: right;">\$2,700.00</span>	\$2,700.00
9/29/2017	Scarlett Basore 10 Nottingham Cir, Bella Vista, AR 72715	Self - Employed General Business	<input type="checkbox"/> Primary <input type="checkbox"/> Pri. Run-Off <input checked="" type="checkbox"/> General <input type="checkbox"/> Gen. Run-Off <input type="checkbox"/> Special Election <input type="checkbox"/> Debt <span style="float: right;">\$2,700.00</span>	\$2,700.00

10-Day Pre-election Report, at page 86:

5/7/2018	Scarlett Crafford Basore 10 Nottingham Cir, Bella Vista, AR 72715	Scarlett Basore Consulting Owner	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> Pri. Run-Off <input type="checkbox"/> General <input type="checkbox"/> Gen. Run-Off <input type="checkbox"/> Special Election <input type="checkbox"/> Debt <span style="float: right;">\$2,700.00</span>	\$2,700.00
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May 2018 CC&E (filed June 15, 2018), at page 5:

5/7/2018	Scarlett Crafford Basore 10 Nottingham Cir, Bella Vista, AR 72715	Scarlett Basore Consulting Owner	<input type="checkbox"/> Primary <input type="checkbox"/> Pri. Run-Off <input checked="" type="checkbox"/> General <input type="checkbox"/> Gen. Run-Off <input type="checkbox"/> Special Election <input type="checkbox"/> Debt <span style="float: right;">\$2,700.00</span>	\$2,700.00
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